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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE
IN SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
META PLATFORMS, INC.'S MATERIAL
SHOULD BE SEALED**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Administrative Motion to
7 Consider Whether Meta Platforms, Inc.'s Material Should Be Sealed, filed in connection with the
8 concurrently filed discovery dispute letter.

9 3. Certain documents and information referenced in the discovery dispute letter have been
10 designated by Defendant Meta Platforms, Inc., as "Confidential" or "Highly Confidential" under the
11 Stipulated Protective Order (Dkt. No. 314).

12 4. Portions of the discovery dispute letter referencing or reflecting the contents of the
13 documents and information designated by Meta Platforms as "Confidential" or "Highly Confidential"
14 have been redacted from the publicly filed version of the letter. *See* Civil L.R. 79-5(e)(1).

15 5. An unredacted version of the discovery dispute letter with these references highlighted
16 in yellow is filed herewith. *See* Civil L.R. 79-5(e)(2), (f)(1).

17 6. Advertiser Plaintiffs' request is limited to documents and information produced by Meta
18 Platforms marked Confidential or Highly Confidential, or information directly reflecting documents
19 and information produced by Meta Platforms marked Confidential or Highly Confidential. This request
20 is thus narrowly tailored to seek sealing only of potentially sealable material.

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on June 14, 2023, in Austin, Texas.

23 /s/ Brian J. Dunne
24 Brian J. Dunne

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